

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JORGE IVAN VALENCIA OSORNO,

Petitioner,

v.

PATRICIA HYDE, Field Office Director,
MICHAEL KROL, HIS New England Special
Agent in Charge,
TODD LYONS, Acting Director U.S.
Immigrations and Customs Enforcement, and
KRISTI NOWM, U.S. Secretary of Homeland
Security,

Respondents.

Civil Action No. 1:25-CV-11592-NMG

STIPULATION OF DISMISSAL

The parties to the above-entitled action state that the Petitioner has been released from custody by the U.S. Immigration and Customs Enforcement without an ankle bracelet or other conditions. Therefore, pursuant to the provisions of F.R.C.P. 41(a)(1)(A)(ii), the parties hereby stipulate that said action be dismissed with prejudice and without fees and costs. All rights to appeal are hereby waived.

Respectfully submitted,

Jorge Ivan Valencia Osorno
The Petitioner

Leah B. Foley
United States Attorney

/s/ Anthony Drago
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/s/ Rayford A. Farquhar
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LOCAL RULE 7.1 CERTIFICATION

I, Anthony Drago, Esq. hereby certify that I communicated with Attorney Rayford A. Farquhar, Assistant United States Attorney, counsel for the Respondents and he assented to me filing the Stipulation of Dismissal as agreed to by the parties.

/s/ Anthony Drago, Esq.
Attorney for Petitioner

CERTIFICATE OF SERVICE

I, Anthony Drago, Esq. do hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 30, 2025.

/s/ Anthony Drago, Esq.
Attorney for Plaintiff